

Exhibit 6

Jacqueline Moline, M.D.

Page 1

MISSOURI CIRCUIT COURT
TWENTY-SECOND JUDICIAL CIRCUIT
ST. LOUIS CITY

TRACEY YVETTE YOUNG, et al.,

Plaintiff,

vs.

Case No. 1522-CC09728-02

JOHNSON & JOHNSON; JOHNSON & JOHNSON
CONSUMER COMPANIES, INC.; AND IMERYS
TALC AMERICA, INC., F/K/A LUZENAC
AMERICA, INC.,

Defendants

-----X

VIDEOTAPED DEPOSITION OF
JACQUELINE MOLINE, MD
Great Neck, New York
Wednesday, January 30, 2019

Reported by:

Angela M. Shaw-Crockett, CCR, CRR, RMR, CSR

Jacqueline Moline, M.D.

Page 2	Page 4
<p>1 2 3 4 January 30, 2019 5 9:14 a.m. 6 7 VIDEOTAPED DEPOSITION of JACQUELINE MOLINE, MD, 8 held at Northwell Medical, 175 Community Drive, 9 Great Neck, New York, before Angela M. 10 Shaw-Crockett, a Certified Court Reporter, 11 Certified Realtime Reporter, Registered Merit 12 Reporter and Notary Public of the States of 13 New York, New Jersey and Connecticut. 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 PROCEEDINGS 2 THE VIDEOGRAPHER: Good morning. We're on 3 the record. My name is Chris Martin. I'm the 4 videographer here for Golkow Litigation 5 Services. Today's date is January 30, 2019, 6 and the time is 10:18 a.m. This deposition is 7 being held at Northwell Medical, 175 Community 8 Drive, Great Neck, New York. The caption on 9 this case is Tracey Yvette Young, et al., 10 versus Johnson & Johnson, et al., Case 11 No. 1522-CC09728-02, filed in the Circuit Court 12 of the City of St. Louis, State of Missouri. 13 The deponent is Dr. Jacqueline Moline. 14 At this time, would counsel please 15 introduce themselves for the record? 16 MR. CABRAL: Colin Cabral on behalf of 17 plaintiff Johnson & Johnson -- 18 MS. FRIEDMAN: Defendant. 19 MR. CABRAL: Sorry. My apologies -- on 20 behalf of defendant Johnson & Johnson, from 21 Proskauer Rose. With me is my colleague Amelia 22 Friedman. 23 MS. BOCKUS: Jane Bockus on behalf of 24 Imerys. 25 MR. SULLIVAN: Ryan Sullivan on behalf of</p>
Page 3	Page 5
<p>1 APPEARANCES: 2 3 FOR THE PLAINTIFFS: 4 The Lanier Law Firm, P.C. 5 10866 Wilshire Boulevard #400 6 Los Angeles, California 90024 7 BY: LEE A. CIRSCH, ESQ. 8 310-277-5100 9 Lee.cirsch@lanierlawfirm.com 10 11 FOR DEFENDANT JOHNSON & JOHNSON 12 Proskauer Rose LLP 13 2029 Century Park East 14 Suite 2400 15 Los Angeles, California 90067-3010 16 BY: COLIN G. CABRAL, ESQ. 17 AMELIA FRIEDMAN, ESQ. 18 310-284-5611 19 ccabral@proskauer.com 20 21 FOR DEFENDANT IMERYS TALC AMERICA, INC. 22 f/k/a LUZENAC AMERICAN, INC.: 23 Dykema Gossett PLLC 24 112 East Pecan Street 25 Suite 1800 San Antonio, Texas 78205 BY: JANE BOCKUS, ESQ. RYAN J. SULLIVAN, ESQ. 210-554-5226 rsullivan@dykema.com ALSO PRESENT: Chris Martin, The Videographer ** ** *</p>	<p>1 Imerys. 2 MR. CIRSCH: Lee Cirsch on behalf of the 3 Young plaintiffs. 4 THE VIDEOGRAPHER: And at this time, the 5 court reporter, Angie Shaw-Crockett, will swear 6 in the witness. 7 DR JACQUELINE MOLINE, 8 called as a witness, having been first duly sworn, 9 was examined and testified as follows: 10 EXAMINATION 11 BY MR. CABRAL: 12 Q. Good morning, Dr. Moline. 13 A. Good morning. 14 Q. You've been deposed before, correct? 15 A. Yes. 16 Q. How many times? 17 A. A lot. 18 Q. Do you have -- 19 A. I haven't counted, but it's many times. 20 Q. What is your best estimate of how many 21 times you've been deposed? 22 A. It's -- it's -- I'm deposed, it seems 23 like, about once a month lately, for the past couple 24 of years. So -- and probably, all totaled, a 25 hundred times or more. I don't know. I try to -- I</p>

2 (Pages 2 to 5)

Jacqueline Moline, M.D.

Page 34	Page 36
<p>1 Q. Has all of your testimony in asbestos 2 cases been on behalf of plaintiffs? 3 A. Testimony, yes. 4 Q. How much money have you made testifying on 5 behalf of plaintiffs in asbestos cases, if you know? 6 A. I have not added up the amount of money 7 I've made. 8 Q. What is your best estimate of how much 9 money you've made testifying on behalf of plaintiffs 10 in asbestos cases? 11 A. I would not be able to give you an 12 accurate estimate. It's varied widely year over 13 year. 14 Q. You testified at a trial in St. Louis last 15 year in a case called Ingham. 16 A. Yes. 17 Q. Do you recall that? 18 THE COURT REPORTER: In a case called? 19 MR. CABRAL: Ingham, I-N-G-H-A-M. 20 BY MR. CABRAL: 21 Q. Do you recall testifying, in that case, 22 that you've made over \$3 million testifying on 23 behalf of plaintiffs in asbestos cases? 24 MR. CIRSCH: Object to form. 25 A. I don't specifically remember testifying</p>	<p>1 a few months away, and I will, in all likelihood, 2 get an extension, so I will not have any idea until 3 October. 4 Q. Do you know if it's over a million 5 dollars? 6 A. It is definitely not over a million 7 dollars. 8 Q. Do you know if it's over a hundred 9 thousand? 10 A. It is most likely over a hundred thousand. 11 Q. Is it over 500,000? 12 A. I do not know. 13 Q. You have testified for The Lanier Law Firm 14 before, correct? 15 A. Yes. 16 Q. How many times have you testified for the 17 Lanier firm? 18 A. Do you mean in deposition or in trial? 19 Q. We'll start with depositions. 20 A. In depositions, probably five to eight 21 times. 22 Q. How many times have you testified at a 23 trial on behalf of the Lanier firm? 24 A. Definitely one time in June. And I don't 25 know if I've ever testified any other time.</p>
Page 35	Page 37
<p>1 to that, but that -- I don't dispute that number. 2 BY MR. CABRAL: 3 Q. You don't dispute that -- 4 A. That that's possible. That -- that if I 5 were to add it up, in all likelihood, over 20 years, 6 that that's an accurate number. 7 Q. I got it. I just -- the question was cut 8 off, so let me just start over, if that's okay. 9 You don't dispute that it's possible 10 you've made over \$3 million testifying on behalf of 11 plaintiffs in asbestos cases? 12 A. I do not -- 13 MR. CIRSCH: Object to form. 14 A. I do not dispute that. 15 BY MR. CABRAL: 16 Q. Do you know how much you have -- let me 17 start over. 18 Do you know how much you earned testifying 19 as an expert witness in 2018? 20 A. I do not. 21 Q. Do you have any estimate? 22 A. No. 23 Q. You have no idea how much you made 24 testifying as an expert last year? 25 A. I haven't gotten my 1099s, and tax day is</p>	<p>1 Q. Do you recall when it was the first time 2 that you worked with the Lanier firm? 3 A. It was several years ago. I don't 4 remember the exact year. 5 Q. What is your best recollection of the year 6 in which you started working with the Lanier firm? 7 A. I honestly don't know. I don't know -- 8 it's been several years. Maybe 2010. 9 Q. Is it accurate that you've worked with 10 Lanier firm on about five to eight cases total? 11 MR. CIRSCH: Object to form. 12 A. No, you asked me how many times I've 13 testified in deposition -- 14 BY MR. CABRAL: 15 Q. Right. 16 A. -- or testified. I know that I've 17 reviewed a few cases a year. Sometimes two or 18 three, for several years. Many of those don't 19 result in testimony. 20 Q. Got it. 21 So how many cases would you say you have 22 worked with the Lanier firm? 23 MR. CIRSCH: Object to form. 24 A. Again, you know, I can't -- it's -- it's 25 probably about -- probably about five cases a year</p>

Jacqueline Moline, M.D.

Page 246				Page 248			
1	INDEX			1			
2	EXAMINATION BY WITNESS	PAGE		2	CERTIFICATE		
3	MR. CABRAL Dr. Jacqueline Moline	5		3			
4	MR. BOCKUS Dr. Jacqueline Moline	220		4	STATE OF NEW YORK)		
5	EXHIBITS			5	: ss		
6	FOR ID DESCRIPTION	PAGE		6	I, Angela M. Shaw-Crockett, a Certified Court		
7	Exhibit 1 294 articles on current reliance list/	52		7	Reporter, Certified Realtime Reporter, Registered Merit		
8	current reference list			8	Reporter and Notary Public within and for the States of New		
9	Exhibit 2 Excerpt for a monograph	55		9	York, New Jersey and Connecticut, do hereby certify:		
10	Exhibit 3 Paper entitled "Cancer Mortality Among Women	67		10	That JACQUELINE MOLINE, MD, the witness whose		
11	in the Russian Printing Industry"			11	deposition is herein before set forth, was duly sworn by me		
12	Exhibit 4 Magnani study that's cited by IARC	81		12	and that such deposition is a true record of the testimony		
13	Exhibit 5 Article by Berry from the year 2000	92		13	given by such witness.		
14	Exhibit 6 Paper titled "Cohort Mortality Study of	102		14	I further certify that I am not related to any of		
15	Women Compensated for Asbestosis in Italy"			15	the parties to this action by blood or marriage and that I		
16	Exhibit 7 Document titled "Does Exposure to Asbestos	109		16	am in no way interested in the outcome of this matter.		
17	Cause Ovarian Cancer? A Systematic			17	In witness whereof, I have hereunto set my hand		
18	Literature Review and Meta-analysis"			18	this 1st day of February, 2019.		
19	Exhibit 8 Document titled "Gynecologic and Breast	121		19			
20	Cancers in Women After Exposure to Blue			20	-----		
21	Asbestos at Wittenoom," dated			21	ANGELA M. SHAW-CROCKETT, CCR, CRR, RMR, CSR		
22	January 29, 2009			22	LICENSE NO. XI00218400		
23	Exhibit 9 Paper titled, "Mortality of female gas mask	133		23			
24	assemblers," by Wignall and Fox from 1981			24			
25				25			
Page 247							
1	EXHIBITS (CONT'D)			1	-----		
2	FOR ID DESCRIPTION	PAGE		2	E R R A T A		
3	Exhibit 10 Paper titled, "Mortality of two groups of	133		3	-----		
4	women who manufactured gas masks from			4	PAGE LINE CHANGE		
5	chrysotile and crocidolite asbestos:			5	REASON: _____		
6	As a 40-year follow-up"			6	REASON: _____		
7	Exhibit 11 Paper titled, "Cancer Mortality and	137		7	REASON: _____		
8	Incidence of Mesothelioma in a Cohort of			8	REASON: _____		
9	Wives of Asbestos Workers in Casale			9	REASON: _____		
10	Monferrato, Italy" dated October 2007			10	REASON: _____		
11	Exhibit 12 Paper titled, "Ovarian cancer and	152		11	REASON: _____		
12	occupational exposure among pulp and			12	REASON: _____		
13	paper employees in Norway," and the lead			13	REASON: _____		
14	author is Langseth and the paper is			14	REASON: _____		
15	dated 2004			15	REASON: _____		
16	Exhibit 13 Paper titled, "Asbestos fibers in ovarian	152		16	REASON: _____		
17	tissue from Norwegian pulp and paper			17	REASON: _____		
18	workers," also authored by Langseth,			18	REASON: _____		
19	dated 2007			19	REASON: _____		
20	Exhibit 14 Presentation titled "Asbestos and Ovarian	179		20	REASON: _____		
21	Cancer," dated November 2016			21	REASON: _____		
22	Exhibit 15 Excerpt from the IARC monograph relating	195		22	REASON: _____		
23	to talc			23	REASON: _____		
24	Exhibit 16 The Gordon 2014 paper	206		24	REASON: _____		
25	(Exhibits retained by the court reporter.)			25	REASON: _____		
	REQUEST						
	145-19 Article						